

SEP 08 2016

EPA-REGION 10

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Adopt Alternative G with enhancements to improve long-term effectiveness, cost effectiveness, increase treatment, reduce exposures and increase community acceptance. Pages 50-52 of the Proposed Plan show that Alternative I fails to protect human health and the environment. Only Alternative G or H meet those legal requirements. The same is true when evaluating long term effectiveness and permanence. A plan that protects human and wildlife health; and where toxic levels , public usage or others are factors, should include:

- 571.7 acres of dredging
- 184.7 acres of capping
- 19.5 acres of ENR
- 1391 acres of MNR

Monitoring of air, water, odor and noise, daily, used while in construction phase with quick testing turnaround and adjustments, particularly when near affected communities for quality of life.

Use of new and emerging technologies, such as those developed by NASA , bio-remediation bacteria that works on PCBs and DDT's and dewatering on barges.

Ensure with oversight that Oregon DEQ has all source controls in place to prevent current and future contamination to the river. Example: The tank farms with 95% of all fuels sources are located in Linnton/Willbridge on liquefiable soils at the rivers edge, with three fault lines underneath and adjacent, without adequate earthquake proofing. DEQ's answer to the question about recontamination at a recent PHCAG meeting "we will deal with it when it happens". An earthquake would result in a huge environmental catastrophe and recontaminate the river.

More extensive natural hazard mitigation should be used in all remedies for earthquakes, flooding and climate change.

Institutional controls are not effective according to GAO. Therefore cleanup goals should eventually eliminate use of ICs.

Assurance bonds/or insurance should be required to pay for any continued and recontamination of the river or need to redo remedies proven to not be meeting goals or through accident.

A storage tax/fee should be applied to the PRPs until the toxic materials are gone from the river, adjusted to the level of toxic material in the sediment, with proceeds to go to OR. school funds.

Ensure that the "Polluter pays" policy is enforced and that the costs are not unfairly shifted to the taxpayers.

Establish for PRP's assurance bonds for any future cleanup that might be required and for potential recontamination.

CDFs in or adjacent to the river should not be considered. Four Portland neighborhood associations have passed resolutions against a CDF and a 2000+ signature petition has been gathered against the CDF at T-4 and CADs in the lower Willamette. The CDF berm and shoulder areas of T-4 are located on liquefiable soils in earthquake fault zones. T-4 is currently fish habitat. Concerns about volatilization of PCBs and other harmful chemicals during the filling of T-4, besides the psychological impacts of living next to a toxic waste dump.

Monitored Natural Recovery with or without enhancements has not been shown to be effective. The lower Willamette is only seasonally depositional in some places, and is affected by prop wash, tidal action, river current, flooding and earthquakes. Contaminated sediments will drift to the Columbia River. Therefore EPA should have less reliance on MNR, increase the monitoring to annually, and have provisions in the ROD for actions if monitoring shows unsatisfactory performance results.

Air volatilization of PCBs needs to be a consideration for removal of a larger volume of sediment. Dr. David Carpenter's studies have shown that residents

living within 5 miles of a Superfund Site, including waterways, are adversely affected by PCB exposure.

A good cleanup improves health, lowers health costs, improves economics, creates jobs, brings industries vying for land no longer associated with toxic liabilities, produces recreating spending, and brings about vibrant communities. In the long term an effective cleanup is less expensive, minimizes monitoring, and eventually lifts institutional controls.

The communities want more than throwing them the bone of not including a CDF. We have spent a lot of effort with the Port of Portland and the City of Portland and have convinced them to withdraw the option of a CDF in the Superfund area. As Oregon Kitchen Table's city wide survey shows 94% of respondents want the river as clean as possible, as do the community groups that support at the very least Alternative G with enhancements. Ensure that future generations will not have to address or readdress the Superfund cleanup. Please enact our requests.

We want vibrant communities, safe recreational use, clean fish, increased economic viability, and protection of human and wildlife health. A good clean up the first time will ensure that.

Thank you for your time and consideration on this matter,

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Board member Linnton Neighborhood Assoc., Board member Northwest Toxic Communities Coalition, Member since 2006 Portland Harbor Community Advisory Group.

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